

REMARKS

Claims 1-96 are pending in the application.

Claims 1-96 stand rejected.

Claim 96 has been amended to correct an informality.

Claims 97 and 98 have been added.

Finality of Office Action

Applicant respectfully submits that the Office action dated August 2, 2005 (Office action) was improperly made final. The Office action states, "Applicant's amendment necessitated the new ground(s) of rejection presented in this Office action. Accordingly, THIS ACTION IS MADE FINAL. See MPEP 706.07(a)." Page 5. Applicant notes that the Office action is a first action. Applicant filed a Request for Continued Examination (RCE) on May 27, 2005, and the Office action is responsive to the RCE. According to MPEP 706.07(b), "it would not be proper to make final a first Office action in a continuing or substitute application where that application contains material which was presented in the earlier application after final rejection or closing of prosecution but was denied entry because ... new issues were raised that required further consideration and/or search."

On May 27, 2005, Applicant filed the RCE and a preliminary amendment containing material that was denied entry when presented after final rejection in the earlier application. The entry of the material was denied in the advisory action dated May 3, 2005: "Applicant has amended the independent claims to include a new limitation that would require further search and consideration." Thus, Applicant submits that it was not proper to make the first Office

action final. Applicant presumes that the finality of the Office action was merely an oversight and request appropriate correction.

Rejection of Claims under 35 U.S.C. §102

Claims 1-5, 7, 12-16, 18, 13-25, 27, 28, 30, 35-39, 41, 42, 44-48, 50, 51, 53-57, 59, 60, 62-67, 69, 70, 72-75, 77, 78, 80-83, 85, 86, 88-91, 93, 94 and 96 stand rejected under 35 U.S.C. §102(e) as being anticipated by Leong, et al., U.S. Patent No. 6,393,475 (Leong). Applicant respectfully traverses this rejection.

As an initial matter, Applicant submits that the pertinence of Leong has not been clearly explained as required by 37 C.F.R. § 1.104(c)(2). In each of the rejections based on 35 U.S.C. § 102, the Office action merely reproduces the claims and inserts citations to the Leong reference. The Office action does not explain, and it is not readily apparent, which components of Leong's system anticipate the features recited in claim 1. Applicant respectfully requests clarification. Nevertheless, Applicant has made every attempt to respond to the rejections recited in the Office action.

Claim 1 clearly distinguishes over the portions of Leong cited in the Office action. Claim 1 recites "an inter-module communication comprising: customer relations management system information; and a message, wherein said message comprises said customer relations management system information, and at least a portion of said message is encoded in a markup language."

The Office action suggests that column 6, lines 37-45 of Leong teaches customer relations management system information. See Page 2. Column 6, lines 37-45 of Leong state:

The network management agent 30 supports a set of managed objects, which in one embodiment are Management Information Base (MIB) objects. The set of

MIB objects supported by the agent 30 are specific to the network device 32, and are termed the MIB view of the agent 30. The managed objects (or variables) provide information regarding the network device, such as, for example, the number of good or bad data frames received at and transmitted from the network device.

Nothing in the cited portion of Leong shows, teaches, or suggests customer relations management system information. While Leong mentions Management Information Base (MIB) objects, Leong does not state that the MIB objects contain information related to a customer relations management system. In fact, Applicant is unable to find anywhere that Leong mentions a “customer relations management system” or even the term “customer.” Therefore, Leong fails to show or teach “customer relations management system information,” as recited in claim 1.

Applicant notes that Leong is directed to performing a network management transaction using a web capable agent. *See* Abstract. However, Leong is not directed to customer relations management system information, customer relations management, or anything else associated with customer relations. Therefore, Leong could not be expected to show, teach or suggest “an inter-module communication comprising: customer relations management system information,” as recited in claim 1.

Accordingly, Applicant submits that claim 1 clearly distinguishes over Leong. Applicant submits that these arguments apply with equal force to claims 12, 23, 37, 46, 55, 65, 73, 81, and 89. Applicant therefore respectfully submits that independent claims 1, 12, 23, 37, 46, 55, 65, 73, 81, and 89, as well as claims 2-5, 7, 11-16, 18, 13-22, 24, 25, 27, 28, 30, 35, 36, 38, 39, 41, 42, 44, 45, 47, 48, 50, 51, 53, 54, 56, 57, 59, 60, 62-64, 66,67, 69, 70, 72, 74, 75, 77, 78, 80, 82, 83, 85, 86, 88, 90, 91, 93, 94, and 96 which depend from claims 1, 12, 23, 37, 46, 55, 65, 73, 81, and 89, are allowable for at least the foregoing reasons. Thus, Applicant requests withdrawal of the rejections based on 35 U.S.C. § 102. Accordingly, Applicant respectfully submits that claims

1-5, 7, 12-16, 18, 13-25, 27, 28, 30, 35-39, 41, 42, 44-48, 50, 51, 53-57, 59, 60, 62-67, 69, 70, 72-75, 77, 78, 80-83, 85, 86, 88-91, 93, 94 and 96 are in condition for allowance.

Rejection of Claims under 35 U.S.C. §103

Claims 6, 8-11, 26, 17, 19-22, 29, 31-34, 40, 43, 49, 52, 58, 61, 68, 71, 76, 79, 84, 87, 92 and 95 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Leong in view of Farrand, et al., U.S. Patent 5,309,563 (Farrand). Applicant respectfully traverses these rejections. As an initial point, each of claims 6, 8-11, 26, 17, 19-22, 29, 31-34, 40, 43, 49, 52, 58, 61, 68, 71, 76, 79, 84, 87, 92 and 95 depends from independent claims 1, 12, 23, 37, 46, 55, 65, 73, 81, and 89, and are allowable for at least the reasons presented in the foregoing discussion of claim rejections under 35 U.S.C. § 103. Additionally, Applicant submits that claims 6 and 8 further distinguish over Leong in view of Farrand.

Claim 6

Applicant submits that any combination of Leong and Farrand fails to show, teach or suggest the features recited in claim 6. Claim 6 recites a “notification comprising other customer relations management system information, said other customer relations management system information being generated by a module generating said message.” With respect to claim 6, the Office action states, “the Farrand reference teaches a notification ... comprising other customer relations management system information.” Page 4.

Applicant respectfully submits that Farrand, like Leong, has nothing whatsoever to do with a customer relations management system or customer relations management system information. Farrand is concerned with a computer-implemented method for transferring command messages between a system manager for a computer system and an associated network operating system. See Abstract. Applicant is unable to identify (and the Office Action fails to

specify) any part of Farrand that teaches a “notification ... comprising customer relations management system information,” as claimed in claim 6.

Accordingly, Applicant submits that claim 6 clearly distinguishes over Leong in view of Farrand. Applicant submits that these arguments apply with equal force to claims 17, 29, 43, 52, 62, 71, 79, 87 and 95. Applicant therefore respectfully submits that claims 6, 17, 29, 43, 52, 62, 71, 79, 87 and 95 are allowable for at least the foregoing reasons. Accordingly, Applicant respectfully submits that claims 6, 17, 29, 43, 52, 62, 71, 79, 87 and 95 are in condition for allowance.

Claim 8

Applicant submits that claim 8 clearly distinguishes over Leong in view of Farrand.

Claim 8 states,

[S]aid agent-related function is one of an AgentLogin command, an AgentLogout command, an AgentInitAuxWork command, an AgentAllMediaAvailable command, a ChangeAgentMediaMode command, a ChangeAgentSkill command, a RequestAgentState request, a RequestAgentMediaMode request, a RequestSystemState request, a RequestAgentWorkableList request, a RequestWorkItemAssignment request, a RequestAgentWorkItemList request and a RequestAgentMediaState request.

The Office action suggests that column 4, lines 3-12 of Farrand teaches at least one of the foregoing functions recited in claim 8. The Office action does not mention which function Farrand teaches or which elements of Farrand teach the function. Column 4, lines 3-12 of Farrand states:

Through this interconnection between the system manager 22 and the network management agent 15, the network management agent 15 may supply information to or receive information collected by the system manager 22. Object management by the system manager 22 may, therefore, be initiated by the network management agent 15 if the network management agent 15 issues instructions to create, delete, modify, reset, or clear objects stored in the system manager.

Farrand discusses creating modifying, resetting, or clearing objects but does not discuss anything related to the functions set forth in claim 8 (and defined in the specification).

Accordingly, Applicant submits that claim 8 clearly distinguishes over Leong. Applicant submits that these arguments apply with equal force to claims 19 and 31. Applicant therefore respectfully submits that claims 8, 19, and 31 are allowable for at least the foregoing reasons. Thus, Applicant respectfully submits that claims 8, 19, and 31 are in condition for allowance.

CONCLUSION

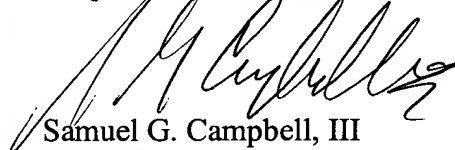
In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5084.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on October 3, 2005.

 10/3/05

Attorney for Applicants Date of Signature

Respectfully submitted,



Samuel G. Campbell, III

Attorney for Applicants

Reg. No. 42,381

Telephone: (512) 439-5084

Facsimile: (512) 439-5099